Illinois Energy Efficiency Stakeholder Advisory Group

2020 SAG Portfolio Planning Process Proposed Energy Efficiency Ideas Template

Submitter Contact Information

Name: Karen Lusson	Name: Laura Goldberg
Organization: National Consumer Law Center	Organization: NRDC/Energy Efficiency For All
Website: nclc.org	Website: nrdc.org; energyefficiencyforall.org
Email: klusson@nclc.org	Email: lgoldberg@nrdc.org
Phone: 708-469-7567	Phone: 708-979-9367

Energy Efficiency Idea Questions

Please check the boxes below to identify 1) the type of idea; 2) which Illinois utility or utilities will be impacted by the idea; and 3) which EE sector the idea impacts.

Check	Type of Energy Efficiency Idea
	New Measure or New Program Idea
\boxtimes	Proposed Program Approach
	Innovative Idea

Check	Illinois Utility Impacted by Energy Efficiency Idea
	Ameren Illinois
	ComEd
	Nicor Gas
	Peoples Gas & North Shore Gas
\boxtimes	All Illinois Utilities

Check	Energy Efficiency Sector Targeted by Energy Efficiency Idea
\boxtimes	Residential Customers – Single Family (non-income qualified/income eligible)
\boxtimes	Residential Customers – Multifamily (non-income qualified/income eligible)
\boxtimes	Residential Customers – Single Family Income Qualified/Income Eligible
\boxtimes	Residential Customers – Multifamily Income Qualified/Income Eligible
\boxtimes	Small Business Customers (commercial & industrial sector)
\boxtimes	Medium/Large Business Customers (commercial & industrial sector)
	Other (research & development, emerging technologies, market transformation)

Additional Questions

1. **Description of Idea:** Describe the proposed idea, including the purpose of the suggested idea and rationale. Describe whether this is an idea that could be implemented in an existing EE program, or whether the idea involves establishing a new measure or program. Please indicate whether additional research may be required before implementation.

<u>Questions to consider</u>: What issue will this proposed change resolve? Will the proposed change increase participation and result in increased energy savings? Will this reduce costs? Will this increase customer satisfaction? Will this help achieve statutory goals? Will this help increase program penetration?

OPERATIONALIZING THE GOALS OF THE FUTURE ENERGY JOBS ACT

NCLC and NRDC seek to ensure that the goals of FEJA to employ more local, diverse vendors in the delivery of energy efficiency programs is achieved – not just for IQ programs, but for all program areas.

Background:

Section 8-103B(c) of the Public Utilities Act provides, in relevant part:

Implementation of energy efficiency measures and programs targeted at lowincome households should be contracted, when it is practicable, to independent third parties that have demonstrated capabilities to serve such households, with a preference for not-for-profit entities and government agencies that have existing relationships with or experience serving low-income communities in the State.

220 ILCS 5/8-103B(c).

The electric utilities are also required to "convene a low-income energy efficiency advisory committee to assist in the design and evaluation of the low-income energy efficiency programs. The committee shall be comprised of the electric utilities subject to the requirements of this Section, the gas utilities subject to the requirements of PROPOSED ENERGY EFFICIENCY IDEA TEMPLATE – PAGE 2 Section 8-104 of this Act, the utilities' low-income energy efficiency implementation contractors, and representatives of community-based organizations."

Proposal:

Given these statutory directives, NCLC and NRDC would like to see increased transparency on how implementers are chosen, and how the utilities' contracting structure is configured -- particularly within the income qualified (IQ) program area. This includes increased reporting, such as the names of the implementers and subcontractors, the levels of contracting and which entities report to whom. A visual diagram would be helpful.

With those goals in mind, we seek to engage the utilities in a facilitated conversation, through the SAG portfolio planning process, with a goal of increasing the number of local, diverse vendors and subcontractors to deliver energy efficiency programs, and establishing clearly identified goals (and ongoing reporting requirements) going forward. Local diverse vendors and subcontractors and any interested stakeholders should be included in the discussion. It is also NCLC's and NRDC's understanding that in some instances, local vendors that have been hired are required to report to larger, national firms that put the small businesses and local Illinois not-for-profit implementers in the position of providing information to potential, future competitors. There should be a discussion of whether or not these layers of contracting are needed, particularly as utilities have increased their own, in-house energy efficiency program staffs. Increasing training opportunities, making RFPs more accessible, and other issues raised at previous IQ and SAG meetings on this topic should be a part of this discussion as well, with a goal for reaching consensus and a clear process for increasing local diverse vendor and subcontractors going forward.

2. **Implementation:** How will this idea be delivered to the target market? Describe marketing strategies used to reach the target market and minimize market confusion.

N/A

3. **Background:** Describe where the idea originated from, including whether this idea has been successfully implemented in other jurisdictions. Provide specific background information that will help utilities and SAG participants understand the proposed idea.

<u>Questions to consider</u>: In what jurisdiction has this idea been successfully implemented? Do you have information on eligible customers, participation achieved, and/or savings achieved? Do you have access to reports describing the successful idea / program approach?

Section 8-103B(c) of the Public Utilities Act, other FEJA provisions that highlight the need to engage communities that have been foreclosed from jobs opportunities.

4. **Idea Impact:** Provide additional information on the customer segment that will be targeted with the program idea, including how and why this idea will have a positive impact on customers participating in Illinois EE programs.

<u>Questions to consider</u>: What level of impact will this idea have on current EE programs? How much additional market share do you estimate this change will impact?

N/A

5. **Duration:** Is this idea intended to be offered for the duration of the 4-year EE Plan or as a pilot measure or program?

Intended for the duration of the 4-year program cycle

6. Estimated Budget: Provide the total estimated budget for each program year (2022 – 2025).

N/A

7. Estimated Participation: Provide participation totals for each program year (i.e. number of measures installed, number of customer participants, etc.)

N/A

Sources

If any sources will be useful to Illinois utilities in reviewing ideas, please either provide links within this template or send attachment(s) to the SAG Facilitator with the Energy Efficiency Idea submittal.